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August 12, 2011

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U.S. Environmental Protection Agency  
EPA East Building  
Confidential Business Information Center  
Room 6428  
Attn: TSCA Section 8(e)  
1201 Constitution Avenue, NW  
Washington, DC 20004



**Re: TSCA Section 8(e) Notice: Rabbit Preliminary Developmental Study with [REDACTED], a Substituted Benzamide, Fourth Submission**

Dear TSCA Section 8(e) Coordinator:

Syngenta Crop Protection, LLC requests that the specific chemical identity and code number shown in brackets in this letter be treated as Confidential Business Information. We enclose a redacted copy of this letter for the public file.

In accordance with EPA's March 16, 1978 policy on Section 8(e) reporting under the Toxic Substances Control Act, and EPA's June 1991 TSCA Section 8(e) Reporting Guide, Syngenta Crop Protection is bringing to your attention information from a preliminary developmental toxicity study in the rabbit conducted with the chemical substance [REDACTED]. This substance is known internally under the designation [REDACTED].

In a preliminary developmental toxicity study, groups of 10 NZW female rabbits were dosed with [REDACTED] at levels of 0, 5, 15 and 30 mg/kg bw/day in vehicle 0.5% CMC, by oral gavage from gestation day 6 to 27. At 30 mg/kg bw/day, one female on gestation day 10 was observed convulsing. The animal recovered and no other clinical signs were recorded for this animal. At the same dose level, two females were terminated (days 13 and 14 of gestation respectively) due to loss of use of hind limbs. At necropsy these animals had red material in the cranial cavity, lumbar region of the spinal column and red frothy material in the trachea. At this point the top dose group was terminated on animal welfare grounds. Animals in all groups, including the controls were noted as difficult to dose and showed reduced feces. There were no other treatment related clinical observations at any other dose level. The study is being referred since deaths were observed at a lower dose level than previously reported.



Company Sanitized

[ ] is a research and development compound being evaluated for pesticidal purposes. These evaluations are being conducted under the supervision of technically qualified personnel, knowledgeable in handling potentially hazardous chemicals.

Please contact the undersigned if you require additional information.

Sincerely,

*Melvin R. Witcher, Jr., CIH*

Melvin R. Witcher, Jr.  
TSCA Coordinator  
Syngenta Crop Protection